

Petition of KeySpan Energy Delivery New England
for Approval of its Long-Range Forecast and Resource
Plan for the five-year period 2001/02 through 2005/06
pursuant to G.L. c. 164, §§ 69 (I) *et. seq.*

i

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to KeySpan Energy Delivery-New England. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

| | | |
|---|----------------------------|---------------|
| Petition of KeySpan Energy Delivery New England for Approval of its Long-Range Forecast and Resource Plan for the five-year period 2001/02 though 2005/06 pursuant to G.L. c. 164, §§ 69 (I) <i>et. seq.</i> |)))))) | D.T.E. 01-105 |
|---|----------------------------|---------------|

| | |
|--------|---|
| AG-3-1 | Please provide the data requested in AG-1-4 separately for the Boston Gas Tennessee gas service area and for the Algonquin gas service area. |
| AG-3-2 | Refer to the Company's response to AG-1-4. Please describe how the Company has determined that the gas supply plans contained in the G-22 Tables for each of the Company's gas service areas incorporate the least cost dispatch of the Company's resources. |
| AG-3-3 | Refer to the Company's response to AG-1-4. Please provide a table of all pricing and availability assumptions made in developing the input data for the SENDOUT model supporting the Company's least cost dispatch of resources contained in the G-22 Tables. |
| AG-3-4 | Refer to the Company's response to AG-1-4. Please provide all analyses done to determine that the Company's total resource mix for each gas service area is optimal and least cost. Include a table, for each gas service area, listing all pricing, capacity release, and availability assumptions relied on in the analyses. Describe each alternative analyzed. Explain how the Company has incorporated excess capacity cost mitigation (both upstream and downstream) in its resource planning process. Explain how capacity management fees and services were incorporated in the analyses. |
| AG-3-5 | Refer to the Company's response to AG-1-4, Attachments F-J. Please provide all input data for the SENDOUT model runs that support the G-22 Table values for |

Boston Gas. Clearly identify each data element and the source. For gas supply, storage and transportation costs, identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).

AG-3-6 Refer to the Company's response to AG-1-4, Attachments F-J. Please provide all input data for the SENDOUT model runs that support the G-22 Table values for Essex Gas. Clearly identify each data element and the source. For gas supply, storage and transportation costs identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).

AG-3-7 Refer to the Company's response to AG-1-4, Attachments F-J. Please provide all input data for the SENDOUT model runs that support the G-22 Table values for Colonial-Lowell. Clearly identify each data element and the source. For gas supply, storage and transportation costs identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).

AG-3-8 Refer to the Company's response to AG-1-4, Attachments F-J. Please provide all input data for the SENDOUT model runs that support the G-22 Table values for Colonial-Cape Cod. Clearly identify each data element and the source. For gas supply, storage and transportation costs identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).

AG-3-9 Refer to the Company's response to AG-3-1. Please provide all input data for the

SENDOUT model runs that support the G-22 Table values for Boston Gas-Tennessee gas service area. Clearly identify each data element and the source. For gas supply, storage and transportation costs identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).

- AG-3-10 Refer to the Company's response to AG-3-1. Please provide all input data for the SENDOUT model runs that support the G-22 Table values for Boston Gas-Algonquin gas service area. Clearly identify each data element and the source. For gas supply, storage and transportation costs identify the contract/tariff by referring to the supply and transportation sources appearing in AG-1-4 Attachment K. All cost data should be broken down into rate elements, indicate whether the element is a fixed or volumetric rate and provide the basis for the charge (MDQ, MMBtus, mcf, etc.). Clearly identify all assumptions and provide the basis for each assumption (inflation rates, production and demand assumptions, basis differential projections, etc.).
- AG-3-11 Please provide the output (reports) of the SENDOUT model showing monthly cost detail and in summary form showing the total cost of each of the Supply Plans contained in the G-22 Tables for of the Company's gas service areas, Boston Gas Algonquin, Boston Gas-Tennessee, Essex, Colonial-Lowell and Colonial-Cape Cod. Include the total cost for each resource and the related volumes.
- AG-3-12 Please re-run the SENDOUT model for Colonial-Cape Cod and Boston Gas-Algonquin gas service area assuming that the HubLine is utilized as a base load resource rather than a peaking resource. Provide the model output (reports) for each area showing monthly cost detail and in summary form showing the total cost for each gas service area. Include the total cost for each resource and the related volumes. Provide revised G-22 Tables that result from the SENDOUT runs. Include all assumptions that differ from those provided in response to AG-3-8 (Colonial-Cape Cod) and AG-3-10 (Boston Gas-Algonquin) and the basis for the modifications. Explain what resources were affected (backed off, under-utilized, or re-dispatched) and how, and to what degree, any fixed costs associated with these affected resources were mitigated (or would be mitigated).
- AG-3-13 Under the provision of the Company's HubLine transportation agreements, do the negotiated rates result in rates that are more or less than the tariffed rate? Please provide the tariffed max rate(s) and the Company's negotiated rates under each of

the contracts, Colonial-Cape Cod and Boston Gas. Include all analyses performed by the Company that supports the decision that the negotiated rates were appropriate and least cost.

- AG-3-14 Under the terms of the HubLine agreements and any related tariff terms and conditions, will the Company be able to release, sell, auction or assign any or all its HubLine capacity. If it cannot, explain why. If it can, explain any restrictions imposed by Algonquin regarding pricing of the of such transactions (can not receive more than the max rate, but Company responsible for difference between max and negotiated rate).
- AG-3-15 In response to discovery in the HubLine case, the Company indicated that it had no firm gas supply contract in place for delivery on the HubLine and during cross examination the Company's witness indicated that the Company was in the process of "informally soliciting suppliers that will be able to meet the company's needs. . ." Exh. AG-1-22. Tr. at 42. Please update that response and indicate the status of the informal solicitation.
- AG-3-16 In response to cross examination in the HubLine case, Ms. Denehy indicated that the Company had not contemplated entering into a gas supply arrangement with either Sithe or the MWRA. Tr. at 43. Please explain why the Company foreclosed this option? Has the Company previously entered into any gas supply arrangements with generators? If yes, please describe each such arrangement (include pricing, interruption provisions and the term of each arrangement) and the specific benefits of each to the Company's retail customers.
- AG-3-17 Please provide an update on the Company's position regarding the use of a portfolio manager after the expiration of the El Paso contract. Discuss the Company's current thinking about combining the resources of KeySpan-NE with New York in a capacity management RFP or some other combined resource strategy.
- AG-3-18 Please provide all analyses, studies, and audits that the Company has performed or has had performed related to El Paso's performance as the Company's capacity manager. Identify the person(s) responsible for each analysis, study, and audit. Describe any planned analyses, studies, and audits that have yet to be completed. Provide these analyses, studies, and audits when completed.

Dated: June 28, 2002